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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

V.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC
SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
KATHY WILCOX, CRAIG ZANNI, DAVID
ZAVALA, JOEL D. SHAPIRO AS
ADMINISTRATOR OF THE ESTATE OF
DAVID E. HALL, VIDOCQ SOCIETY,
CITY OF COQUILLE, CITY OF COOS
BAY, and COOS COUNTY,

Defendants.

Civil Case No. 6:20-CV-01163-MTK
(Lead Case)

DECLARATION OF MEREDITH A.
SAWYER IN SUPPORT OF
DEFENDANT VIDOCQ SOCIETY'S
REPLY TO PLAINTIFFS' RESPONSE
TO VIDOCQ SOCIETY'S MOTION
FOR SUMMARY JUDGMENT

VIDOCQ SOCIETY,

Cross-Claimant.

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC
SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
KATHY WILCOX, CRAIG ZANNI, DAVID
ZAVALA, JOEL D. SHAPIRO AS
ADMINISTRATOR OF THE ESTATE OF
DAVID E. HALL, CITY OF COQUILLE,
CITY OF COOS BAY, and COOS COUNTY.

Cross Defendants

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

v.

OREGON STATE POLICE,

Defendant.

Civil Case No. 3:21-cv-01719-MTK
(Trailing Case)

I, Meredith a Sawyer, declare:

1. I am an attorney licensed to practice law in the State of Washington I have been admitted to appear in this case, pro hac vice, and am an attorney of record for Defendant Vidocq Society in this matter
2. I have personal knowledge of the matters attested to in this declaration and am competent to testify.
3. Attached hereto as **Exhibit 33** are true and correct copies of additional excerpts from the deposition of Paul Frasier taken in the current case on August 29, 2023.

4. Attached hereto as **Exhibit 34** is a true and correct copy of the journal article, Kepler, Walter 1999, Profiling Killers: A Revised Classification Model For Understanding Sexual Murder, *International Journal Of Offender Therapy*, 43(4) 417-437.
5. Attached hereto as **Exhibit 35** is a true and correct copy of correspondence regarding investigations performed by Vidocq Society and the American Academy of Forensic Scientists.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

EXECUTED this 18th day of March, 2025 in Seattle, Washington.

HWS LAW GROUP

BY: /s/ Meredith A. Sawyer
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